

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 23-186 (ECT/JFD)

UNITED STATES OF AMERICA

v.

**GOVERNMENT'S
EXHIBIT LIST**

CHARLY CRUZ JIMENEZ

PRESIDING JUDGE The Honorable Eric C. Tostrud				GOVERNMENT'S COUNSEL Nathan H. Nelson, AUSA Brad Endicott, AUSA	DEFENDANT'S COUNSEL Tom Plunkett, <i>Esq.</i>
TRIAL DATE February 11, 2025				COURT REPORTER	COURTROOM DEPUTY Rachel Morton
EXH. #	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBIT	
1			X	Photographs of text messages between the defendant and Cesar Aguirre-Bravo obtained from Aguirre-Bravo's cellular phone, with parallel English translations by Adriana Trevino, TransLanguages	
2			X	Video of text messages between the defendant and Nicholas Horak obtained from Nicholas Horak's cellular phone	
2A			X	Excerpt of text message between the defendant and Nicholas Horak related to a December 14, 2021, drug purchase	
2B			X	Excerpt of text message between the defendant and Nicholas Horak related to a December 21, 2021, drug purchase	
2C			X	Excerpt of text message between the defendant and Nicholas Horak related to a December 31, 2021, drug purchase	
2D			X	Excerpt of text message between the defendant and Nicholas Horak related to a January 2, 2022, drug purchase	
2E			X	Excerpt of text message between the defendant and Nicholas Horak related to a January 6, 2022, drug purchase	

EXH. #	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBIT
2F				Excerpt of text message between the defendant and Nicholas Horak related to a January 9, 2022, drug purchase
2G			X	Excerpt of text message between the defendant and Nicholas Horak related to a January 21, 2022, drug purchase
2H			X	Excerpt of text message between the defendant and Nicholas Horak related to a January 24, 2022, drug purchase
2I			X	Excerpt of text message between the defendant and Nicholas Horak related to a January 29, 2022, drug purchase
2J			X	Excerpt of text message between the defendant and Nicholas Horak related to a February 8, 2022, drug purchase
2K			X	Excerpt of text message between the defendant and Nicholas Horak related to a February 21, 2022, drug purchase
2L			X	Excerpt of miscellaneous text message between the defendant and Nicholas Horak
3			X	Statement of cooperating individual (SEALED)
4A			X	April 20, 2022, voice message from the defendant to the UC about having 6 kilograms of “white stuff” for sale
4B			X	April 20, 2022, voice message from the defendant to the UC offering \$500 per kilogram for the UC’s assistance in selling the 6 kilograms
5A			X	June 21, 2022, voice message from the defendant to the UC referencing how the defendant’s “guy” is about to go withdraw the money out that had been sent by the UC
5B			X	June 21, 2022, voice message from the defendant to the UC about details of money sent by the UC
6			X	June 22, 2022, excerpt of texts between the defendant and the UC regarding the theft of the defendant’s drugs
7			X	July 16, 2022, excerpt of texts between the defendant and the UC regarding the defendant having kilos for sale
7A			X	July 16, 2022, voice message from the defendant to UC explaining that the drugs being sold to the UC is “new stuff” from the “my town, from Tamaulipas”

EXH. #	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBIT
7B			X	July 16, 2022, voice message from the defendant to the UC explaining that the drugs being sold are from “another cartel”
8			X	August 6, 2022, excerpt of texts between the defendant and the UC regarding the defendant having 10 kilograms of “windows” located in MN for sale
8A			X	August 6, 2022, voice message from the defendant to the UC saying “I have ten kilos of stuff”
8B			X	August 6, 2022, voice message from the defendant to the UC advertising the drugs as being “real, real good”
8C			X	August 6, 2022, voice message from the defendant to the UC advising the drugs are “there right now” and asking if the UC wants “two, three kilos.”
8D			X	August 6, 2022, voice message from the defendant to the UC saying “it’s my town, you know, so they never going to do shit” and asking to give the UC “two keys”
9A			X	September 19, 2022, voice message from the defendant assuring the UC that he “will never send you bad people”
9B			X	September 19, 2022, voice message from the defendant assuring the UC that the defendant is a “Sureño king” and his people are watching
10A			X	July 2-5, 2023, excerpt of text messages between the defendant and the UC regarding the defendant’s involvement in a cartel war
10B			X	July 6, 2023, excerpt of text messages between the defendant and the UC regarding the defendant’s involvement in a cartel war
10C			X	Photographs of the defendant sent to the UC depicting the defendant fighting in a self-described “cartel war”
				<i>The government reserves the right to introduce additional exhibits as the evidence develops and in rebuttal.</i>